

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

TERI DEAN,	)	
	)	
Plaintiff,	)	Cause No. 5:19-cv-06022
	)	
v.	)	JURY TRIAL DEMANDED
	)	
EDWARD BEARDEN, et al.	)	
	)	
Defendants.	)	

**JOINT MOTION TO STAY PROCEEDINGS**

COME NOW Plaintiff Teri Dean and Defendants Edward Bearden, Elijah L. Mosier, Todd E. Mustain, Kevin L. Reed and Anne L. Precythe (“The Parties”), by and through their undersigned Counsel, and state as follows:

1. This action, filed on February 22, 2019 was brought by Plaintiff Teri Dean against Defendants Edward Bearden, Elijah L. Mosier, Todd E. Mustain, Kevin L. Reed and Anne L. Precythe (“Defendants”) alleging she was sexually assaulted while incarcerated at the Chillicothe Correctional Center.

2. Counsel for The Parties have been notified by the U.S. Department of Justice (hereinafter “DOJ” or “the Department”) that, with the Federal Bureau of Investigation, the Department was investigating the possibility of federal criminal charges against one or more of the Defendants in this action.

3. An attorney at the DOJ has requested that The Parties all consent to a stay of this civil proceeding so as to allow DOJ to complete its investigation, so that civil discovery does not interfere with the DOJ investigation.

4. All Parties, through their undersigned Counsel, have consented to a stay until the completion of the DOJ investigation.

WHEREFORE, The Parties request this Court stay all proceedings herein and set this matter for a status conference on or about May 1, 2019, to determine the status of the federal investigation and whether the stay in this matter should be terminated or extended, and, in the event a stay is granted, to extend the due date of Defendants' Rule 12(a) Responses to Plaintiff's First Amended Complaint until fourteen (14) days after the termination of the stay, but in no event before April 26, 2019.

Respectfully submitted,

/s/ Jenifer C. Snow

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been served upon all Counsel via the electronic filing system this 2nd day of April, 2019.

/s/ Jenifer C. Snow